

H R I P R O P E R T I E S



May 7, 2012

Brenda Evans
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, LA 70808

Re: Comment to 2013 Qualified Allocation Plan

Dear Mrs. Evans,

Please accept this letter and its proposed language for consideration in the upcoming 2013 Qualified Allocation Plan (QAP).

Within Section I.C. "Maximum Tax Credits," we propose the following:

Increase of the per Developer limit to \$1,200,000 under the 2013 QAP. The QAP is designed to award credits to the highest scoring developments which represent the LHC's intended direction for affordable housing in Louisiana. Increasing the per Developer limit allows more deals to compete on their own merit rather than forcing Developers to forgo quality projects to avoid running into a credit limit which has been set at the lowest level in six years.

Within Section IV "Glossary," we propose the following revisions:

RURAL AREA: Any area outside of the **Metropolitan Statistical Areas (MSA)** of New Orleans/Metairie/Kenner, Baton Rouge, Shreveport/Bossier City, Lafayette, Houma/Bayou Cane/Thibodeaux, Lake Charles, Monroe, Alexandria, Opelousas/Eunice.

URBAN REDEVELOPMENT AREA: An area or areas (i) which are within a city of 20,000 or more, but outside of a Qualified Census Tract, (ii) which do not exceed in the aggregate 5% of the geographic area of the city, and (iii) which are

specified by a local governmental unit as requiring redevelopment or revitalization pursuant to a Concerted Community Revitalization Plan; OR a Federally designated Choice Neighborhood.

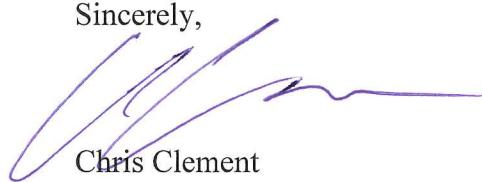
Within "Selection Criteria and Evidentiary Materials," Section I(E)(ii):

Increase point availability for substantial rehabilitation or conversion of a Historic Property to nine (9) points in order to incentivize the development of an Historic Property over a Non-Historic Property (currently awarded eight (8) points). Offering more points to Developers to ignore a Historic Property in favor of a higher scoring Non-Historic Property is in direct conflict with the State's previous desire to bring Historic structures out of blight and back into commerce.

The current point discrepancy in Section I(E)(ii) and (iii) also contradicts the point allocation for certain Scattered Site deals in the draft 2013 QAP. Within Selection Criteria Section I(D), a new construction Scattered Site deal is offered eight (8) points, while Section I(F)(ii) offers a Scattered Site Historic Property nine (9) points. This intention of rewarding the pursuit of Historic Properties should be uniform for both Non-Scattered Site deals and Scattered Site deals.

HRI respectfully requests that the LHC consider these comments in drafting the 2013 QAP. Should you have any questions, or if you would like to discuss further, please do not hesitate to contact me. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Clement".

Chris Clement